

**BEFORE THE PHARMACY BOARD OF THE STATE OF IOWA**

<b>IN THE MATTER OF</b>  <b>ANTOINETTE THOMPSON,</b>  <b>RESPONDENT</b>	<b>CASE NO.: 2024-0196 and 2024-0197</b> <b>DIAL NO.: 26DBPB0004</b> <b>NOTICE OF HEARING AND</b> <b>STATEMENT OF CHARGES</b>
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**COMES NOW** the Iowa Board of Pharmacy (“Board”) and files this Notice of Hearing and Statement of Charges against Antoinette Thompson, ARNP (“Respondent”), pursuant to Iowa Code §§ 17A.12(2) and 272C.3(1)(e), and 657 Iowa Administrative Code (“IAC”) 35.6 and 35.7.

**A. TIME, PLACE AND NATURE OF HEARING**

1. **Hearing.** A contested case hearing shall be held on January 7, 2026 before the Board. The hearing shall begin at 9:00 a.m. and shall be located in the conference room at the office of the Iowa Board of Pharmacy, 6200 Park Avenue, Ste. 100, Des Moines, Iowa 50321.

2. **Prehearing Conference.** A prehearing conference to schedule pre-hearing deadlines shall be held by telephone on December 5, 2025 at 1:00 p.m. before Administrative Law Judge Lockard from the Iowa Department of Inspections, Appeals and Licensing (ALJ) at the following conference line, 888-601-4725. Any party may request a prehearing conference to discuss evidentiary issues related to the hearing in accordance with 657 IAC 35.22.

3. **Answer.** Within twenty (20) days of the date you are served this Notice of Hearing and Statement of Charges you may file an Answer. In that Answer, you should also state whether you will request a continuance of the date and time of the hearing.

4. **Filing of Pleadings.** Pleadings shall be filed with the Board at the following address: Iowa Board of Pharmacy, 6200 Park Avenue, Ste. 100, Des Moines, Iowa 50321, by email to [mary.collins@dia.iowa.gov](mailto:mary.collins@dia.iowa.gov), or electronically using the Administrative Electronic Document

Management System ([adminhearings.iowa.gov/efile/](http://adminhearings.iowa.gov/efile/)).

5. **Presiding Officer.** The Board shall serve as presiding officer at the contested case hearing, but the Board hereby delegates to an Administrative Law Judge from the Department of Inspections, Appeals and Licensing, the authority to make initial rulings on prehearing matters, and requests the administrative law judge be present to assist and advise the Board at hearing.

6. **Hearing Procedures.** The procedural rules governing the conduct of the hearing are found at 657 IAC 35.25. At the hearing, you may appear personally or be represented by legal counsel at your own expense. You will be allowed the opportunity to respond to the charges against you, to produce evidence on your behalf on issues of material fact, cross-examine witnesses present at the hearing, and examine and respond to any documents introduced at hearing. If you need to request an alternative time or date for hearing, you must comply with the requirements of 657 IAC 35.23. The hearing may be open to the public or closed to the public at the discretion of the Respondent.

7. **Prosecution.** The Office of the Attorney General is responsible for representing the public interest (the State) in this proceeding. Pleadings shall be filed with the Board and copies should be provided to counsel for the State at the following address: Angela Stuedemann and Kevin Protzmann, Assistant Attorneys General, Iowa Department of Justice, Office of the Iowa Attorney General, 1305 E. Walnut Street, 2<sup>nd</sup> Floor, Des Moines, Iowa 50309.

8. **Communications.** You may not contact Board members in any manner, including by phone, letter, facsimile, in person or e-mail, about this Notice of Hearing and Statement of Charges. Board members may only receive information about the case when all parties have notice and an opportunity to participate, such as at the hearing or in pleadings you file with the Board and serve upon all parties in the case. You may contact Mary Collins, Board Executive, Iowa Board of

Pharmacy at 515-381-7028, or Assistant Attorney General Angela Stuedemann, 515-281-6699, and [angela.stuedemann@ag.iowa.gov](mailto:angela.stuedemann@ag.iowa.gov), and Assistant Attorney General Kevin Protzmann, 515-281-6690 and [kevin.protzmann@ag.iowa.gov](mailto:kevin.protzmann@ag.iowa.gov).

## **B. LEGAL AUTHORITY AND JURISDICTION**

9. **Iowa License**. Respondent maintains Iowa CSA-Individual registration number 5205180 and Iowa CSA-Individual registration number 5203839. Respondent's Iowa CSA-Individual registrations are both currently active and will next expire on March 15, 2027.

10. **Jurisdiction**. The Board has jurisdiction in this matter pursuant to Iowa Code § 155A And § 124.

11. **Legal Authority**. If any of the allegations against you are founded, the Board has authority to take disciplinary action against you under Iowa Code § 155A and 657 IAC 36.1.

12. **Default**. The Board may enter a default decision or proceed with the hearing and render a decision in your absence, in accordance with Iowa Code § 17A.12(3) and 657 IAC 35.27.

## **C. STATEMENT OF CHARGES**

### **COUNT I**

13. Respondent is charged under 657 IAC 10.10(1)(d) which states that the Board may discipline any registrant upon a finding that the registrant has committed such acts as would render the registrant's registration under Iowa Code 124.303 inconsistent with the public interest as determined by that section.

### **COUNT II**

14. Respondent is charged under 657 IAC 36.6(3) for knowingly making misleading, deceptive, untrue or fraudulent representations in the practice of pharmacy or engaging in

unethical conduct or practice harmful or detrimental to the public. Proof of actual injury need not be established.

**COUNT III**

15. Respondent is charged under 657 IAC 36.6(39) for forging or altering a prescription.

**COUNT IV**

16. Respondent is charged under Iowa Code 124.302(4) which requires a separate registration for each principal place of business or professional practice where the applicant. . . distributes, dispenses. . . controlled substances.

**COUNT V**

17. Respondent is charged under Iowa Code 124.308 which states that a prescription drug that is a controlled substance shall not be dispensed without a prescription. The prescription must be authorized by a practitioner and must comply with this section, section 155A.27, applicable federal law and regulation, and rules of the board.

**COUNT VI**

18. Respondent is charged under Iowa Code 124.401(5)(a) which states it is unlawful for any person knowingly or intentionally to possess a controlled substance unless such substance was obtained directly from, or pursuant to, a valid prescription or order of a practitioner while acting in the course of the practitioner's professional practice.

**COUNT VII**

19. Respondent is charged under Iowa Code 155A.27(1) that states a prescription drug shall not be dispensed without a prescription that is authorized by a prescriber and based on a valid patient-prescriber relationship.

#### D. STATEMENT OF THE MATTERS ASSERTED

20. **Practice Setting**. Respondent is an Iowa-licensed advanced registered nurse practitioner.

21. **Allegations**. A short and plain Statement of the Matters Asserted (Statement) was reviewed and approved by the Board at the time this Notice of Hearing and Statement of Charges was filed. The Statement shall be furnished to Respondent as an attachment to this Notice of Hearing and Statement of Charges. However, the Statement is not a public record pursuant to Iowa Code § 272C.6(4)(a).

#### E. SETTLEMENT

22. This matter may be resolved by settlement agreement. The procedural rules governing the Board's settlement process are found at 657 IAC 35.24. If you are interested in pursuing settlement of this matter, please contact the Assistant Attorneys General identified above.

#### F. PROBABLE CAUSE FINDING

23. On January 7, 2025, the Iowa Board of Pharmacy found probable cause to file this Notice of Hearing and Statement of Charges.



Erik Maki, PharmD  
Chairperson  
Iowa Board of Pharmacy

Copy to:  
Angela Stuedemann  
Kevin Protzmann  
[Angela.Stuedemann@ag.iowa.gov](mailto:Angela.Stuedemann@ag.iowa.gov)  
[Kevin.Protzmann@ag.iowa.gov](mailto:Kevin.Protzmann@ag.iowa.gov)

PLEASE NOTE: If you require the assistance of auxiliary aids or services to participate in this matter because of a disability, immediately call 515-281-0233. (If you are hearing impaired, call Relay Iowa TTY at 1-800-735-2942).